

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re:

Elizabeth J Venturini,  
  
Debtor.

Case No. 19-24947

Chapter 13

Honorable A. Benjamin Goldgar

**AGREED DEFAULT ORDER**

THIS CAUSE coming on to be heard upon the Motion for Relief from Automatic Stay filed on behalf of American Advisors Group, (hereinafter referred to as "Movant"), a secured creditor or servicing agent for a secured creditor holding a lien on the Debtor's property commonly known as 724 Patton Drive, Buffalo Grove, Illinois 60089 (hereinafter referred to as the "Property"), all parties having notice, the Court having jurisdiction and being fully advised:

IT IS HEREBY ORDERED:

1. The current post-petition arrearage, through May 31, 2020, is \$437.00. The arrears include:

\$437.00 Insurance Advances (non-escrow).

2. In addition to maintaining insurance coverage and making real estates tax payments timely, the Debtor shall cure the remaining arrears of \$437.00, by making the following monthly payments directly to American Advisors Group:

\$72.83 on or before June 15, 2020;  
\$72.83 on or before July 15, 2020;  
\$72.83 on or before August 15, 2020;  
\$72.83 on or before September 15, 2020;  
\$72.83 on or before October 15, 2020; and  
\$72.85 on or before November 15, 2020.

3. Movant is to file a Notice of Post-Petition Fees and Expenses within thirty (30) days of the entry of this order for the fees and costs included in the filed motion for relief from stay.

4. If the Debtor fails to timely pay two or more (i) plan payments to the Chapter 13 Trustee; (ii) payments for property insurance and/or general real estate taxes; or (iii) Debtor fails to cure the arrears pursuant to paragraph 2 above, then the Debtor shall be deemed to be in default. Upon Movant's notice of the default to the Debtor and the Debtor's attorney, the Debtor shall have fourteen (14) days from the date the Notice of Default is filed, to cure the default. If the default is not cured within fourteen (14) days from the date the Notice of Default is filed, the

automatic stay shall be terminated as to the Property upon Movant filing a Notice of Lifting with the Court. The filing of a Notice of Lifting shall have the legal effect of modifying the automatic stay without further order of the Court.

4. The Debtor may avail herself of the cure provision set forth in paragraph 2 or 4 above a total of two (2) times. In the event of a third (3rd) default, Movant may file a Notice of Lifting with the Court, and the automatic stay will automatically modify without further Order as Debtor will no longer have the right to cure thereunder.

5. The Proof of Claim filed by Movant shall stand unaffected and payments made thereunder shall be paid to Movant until a Notice of Default and Notice of Lifting are filed with the Bankruptcy Court.

6. If the Debtor's Bankruptcy case is dismissed or converted to another Chapter, this agreed repayment order shall be void.

7. In the event that Heavner, Beyers & Mihlar, LLC should have to send out any Notices of Default, the Debtor shall pay an extra \$50.00 per notice, as additional attorneys' fees, in addition to whatever funds are needed to cure the default and that said additional funds must be tendered prior to the expiration of the cure period as set-forth in the Notice.

AGREED:

American Advisors Group

Elizabeth J Venturini


/s/ Cheryl Considine

Cheryl Considine  
one of its attorneys

/s/ David H. Cutler

David H Cutler, her attorney

DATED: May 12, 2020

ENTER: 

\_\_\_\_\_  
Bankruptcy Judge

FAIQ MIHLAR (#6274089)  
HEATHER M. GIANNINO (#6299848)  
AMANDA J. WIESE (#6320552)  
CHERYL CONSIDINE (#6242779)  
PINJU CHIU (#6329542)  
HEAVNER, BEYERS & MIHLAR, LLC  
Attorneys at Law  
P.O. Box 740  
Decatur, IL 62525  
Email: [bkdept@hsbattys.com](mailto:bkdept@hsbattys.com)  
Telephone: (217) 422-1719  
Facsimile: (217) 422-1754